

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA  
WEST PALM BEACH DIVISION

CASE NO.23-80101-CR-CANNON

UNITED STATES OF AMERICA

v.

CARLOS DE OLIVEIRA

Defendant.

\_\_\_\_\_/

**MOTION FOR LEAVE TO TRAVEL**

Defendant Carlos De Oliveira, by and through undersigned counsel, respectfully requests that this Court enter an Order permitting him to travel to the Middle District of Florida on December 17, 2023, and January 8, 2024.

On July 31, 2023, the Court set Mr. De Oliveira's Conditions of Bond, which prohibited him from traveling outside the Southern District of Florida unless otherwise approved by the Court prior to any such travel (ECF No. 90). Mr. De Oliveira therefore seeks the Court's permission to travel to the Middle District of Florida on December 17, 2023, and January 8, 2024, with his family, including out-of-town guests, for holiday vacation purposes.

Undersigned counsel has inquired of government counsel and Mr. De Oliveira's Probation Officer as to whether they object to this request. Government

counsel does not object, and the Probation Officer defers to the Government. At the Probation Officer's request, Mr. De Oliveira shall provide her with the details of his travel prior to his departure.

Dated: December 6, 2023

Respectfully Submitted

*/s/ Larry Donald Murrell, Jr.*

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*/s/ John S. Irving, IV*

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Attorneys for Defendant Carlos De Oliveira

### **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on December 6, 2023, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF, which in turn serves counsel of record via transmission of Notices of Electronic Filing.

*/s/ Larry Donald Murrell, Jr.*  
LARRY DONALD MURRELL, JR.